

Attachment 1

Worksheet Documentation of Land Use Plan Conformance and Documentation of NEPA Adequacy (DNA)

U.S. Department of the Interior
Utah Bureau of Land Management (BLM)

This worksheet is to be completed consistent with guidance provided in instructional text boxes on the worksheet and the 'Guidelines for Using the DNA Worksheet' located at the end of the worksheet. The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

A. BLM Office: Richfield Field Office

Lease/Serial/Case File: Not Applicable

Proposed Action Title/Type: Leasing for Oil and Gas as offered by competitive leasing under the Minerals Act of 1920, as amended.

Location of Proposed Action: Multiple townships in Sanpete and Piute Counties, Utah.

Description of the Proposed Action:

Public land in the Richfield Field Office has been nominated by the public for Federal oil and gas leasing. A list of eleven parcels of public land that have been nominated and a map showing the parcels are included in Attachment DNA-1.

Leasing for oil and gas is allowed under the Mineral Leasing Act of 1920, as amended. Parcels of land nominated by the public are offered for leasing through a competitive process, and a competitive lease sale is held each quarter of the year. The subject parcels would be offered in the May 2006 competitive lease sale. If a parcel is not leased through competitive bidding, then for two years following the competitive sale, the parcel would be available through a noncompetitive sale. A lease, once issued, may be held for a primary term of 10 years. After 10 years, the lease expires unless oil and/or gas are produced, and if there is production, then a lease is held for as long as production is in paying quantities.

Based on land use planning, parcels offered for lease are subject to four leasing categories. These categories are:

- Category 1: Open to leasing, subject to standard lease terms,
- Category 2: Open to leasing, subject to standard lease terms and special stipulations,
- Category 3: Open to leasing, subject to standard lease terms and no surface occupancy, and

- Category 4: Not open to leasing.

The parcels nominated for leasing include land in Category 1.

Applicant (if any):

Industry representatives have nominated public land for the leasing of Federal oil and gas.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

Land Use Plan:

Date Approved:

Mountain Valley Management Framework Plan
Parker Mountain Management Framework Plan
Henry Mountain Management Framework Plan

1982
1979
1982

Other documents:

Date Approved:

None

N/A

Parcels UT0506-021, UT0506-022, UT0506-024, and UT0506-025 are subject to the Mountain Valley Management Framework Plan. Parcel UT0506-117 is subject to the Parker Mountain Management Framework Plan. Parcels UT0506-135 through UT0506-137, UT0506-192, UT0506-221, and UT0506-222 are subject to the Henry Mountain Management Framework Plan. The decisions in these plans are to implement oil and gas leasing in accordance with the category system. Some described parcels overlap an adjacent BLM field office, and the decisions in these plans would only apply to the portion of a parcel in Richfield Field Office.

The subject parcels include public land with split estate, where the surface estate is non-federal and the oil and gas estate is federal. The decisions in the above-listed, land use plans apply to public land, which is defined in Sec. 103(e) of the Federal Land Policy Management Act of 1976 as “* * * any land and interest in land owned by the United States * * * administered by the Secretary of the Interior through the Bureau of Land Management * * *.”

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action:

- Oil and Gas Leasing Environmental Assessment Record, 43-050-5-31, Bureau of Land Management, Richfield District (1975), subsequently referred to as the Richfield District Oil and Gas EA
- Environmental Analysis Record, Oil and Gas Leasing, Fillmore District, Bureau of Land Management (1976), subsequently referred to as the Fillmore District Oil and Gas EA,
- Price District, Oil and Gas Environmental Analysis Record, UT-060-6-1 (1975), subsequently referred to as the Price District Oil and Gas EA,
- Utah Combined Hydrocarbon Leasing Regional EIS (1984), subsequently referred to as the CHL EIS, and
- Oil and Gas Leasing Implementation EA for Henry Mountain and Sevier River Resource Areas (1988), UT 050-89-024, subsequently referred to as the Implementation EA.

The 1975 Richfield and Price District Oil and Gas EA and the 1976 Fillmore District Oil and Gas EA address leasing for oil and gas programmatically. In 1975, public land, now in the Richfield Field Office, was administered by three different District Offices, as follows:

- Public land in Sanpete County was included in the Fillmore District.
- Public land in Sevier County and in Wayne County, generally west of the Dirty Devil River, was included in the Richfield District.
- Public land in Wayne County, generally east of the Dirty Devil River, was included in the Price District.

Thus, the District Oil and Gas EAs apply to the public land as described above. In 1976, administrative boundaries were adjusted, and the public land as described above became part of the re-aligned Richfield District.

In 1988, the Implementation EA was prepared to address leasing in the Sevier River and the Henry Mountain Resource Areas, which were part of the Richfield District. This EA allows for leasing as directed in the Mountain Valley MFP. The Richfield District Oil and Gas EA was cited in the Implementation EA; however, by oversight, the Fillmore and Price District Oil and Gas EAs were not specifically cited. However, the applicable land use plans in 1988 are the Mountain Valley MFP, Parker Mountain, and Henry Mountains MFPs, and these plans addresses leasing of public land in Sanpete, Sevier, and Wayne Counties.

In 1996, the Richfield District boundaries were again re-drawn. Public land as described above is now included in the Richfield Field Office.

D. NEPA Adequacy Criteria

The proposed action has been reviewed by BLM specialists, which have expertise in natural resources. Documentation of this review of the existing NEPA record and the environmental analysis is provided through an Interdisciplinary Team Analysis Checklist (Attachment DNA-1). The documentation and explanation to each of the adequacy criteria are based on this interdisciplinary approach and review.

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

☒ Yes
☐ No

Documentation of answer and explanation:

In the 1975-76 District Oil and Gas EAs, the proposed action is to lease public lands that are administered by the Bureau of Land Management for oil and gas exploration and development. Activities that could be associated with oil and gas exploration and development are described as petroleum operations that progress through five phases, which include: preliminary investigations, exploratory drilling, development, production, and abandonment. Operations normally progress from one phase to the next, although abandonment may follow any one stage or two or more stages could occur concurrently in a given area. Although some variation in the discussion may be noted, both EAs have a detailed description of the proposed action and the possible oil and gas activities that may occur, if leasing is allowed. The proposed action is addressed in the 1975-76 EAs as follows:

- Richfield District Oil and Gas EA, p. 1-25,
- Fillmore District Oil and Gas EA, p. 1-11, and
- Price District Oil and Gas EA, p. 1-13.

In the 1988 Implementation EA (p. 1-2), oil and gas leasing would be allowed on the subject parcels, subject to the land use plans and subject to the leasing categories that are identified in those plans. The appropriate leasing categories are identified in this EA on p. 4, 5, 8-10, and Appendix 1. This EA references the "original EA" of the Richfield District. As stated at Section C of this document, the Fillmore and Price District Oil and Gas EAs were unintentionally omitted from reference in the Implementation EA. The leasing categories are identified and delineated for public land within the field office, and the category designations are consistent with the analysis in the 1975-76 District Oil and Gas EAs and the decisions in the approved land use plans. As previously stated, the subject parcels, as located in the Richfield Field Office, include public land in Category 1

The proposed action—leasing for oil and gas in the May 2006 sale—is substantially the same as the proposed action analyzed in each of the above environmental documents. Public land would be offered for leasing, and exploration and development for oil and gas resources may occur dependent on specific approval by the BLM and dependent on site-specific NEPA analysis. If land is leased, a lessee would be afforded rights to explore for and to develop oil and gas, subject to the lease terms, regulations, and laws.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

☒ Yes
☐ No

Documentation of answer and explanation:

In the 1975-76 District Oil and Gas EAs, BLM evaluated one alternative to leasing which is to not allow leasing. The no leasing alternative is described in each District Oil and Gas EA as follows:

- Richfield District Oil and Gas EA, p. 26.
- Fillmore District Oil and Gas EA, p. 11, and
- Price District Oil and Gas EA, p. 13.

In the 1988 Implementation EA (p. 2), alternative proposals to the proposed action are not evaluated, "(b)ecause this assessment finds no significant impact from the analysis of the proposal," which is to allow for leasing. Therefore, no leasing nor another alternative were not considered in the 1988 Implementation EA, because the potential impacts to the environment from oil and gas leasing are adequately analyzed in the 1975-76 EAs, and no further study of alternatives is warranted. The rationale for this absence of alternatives to the proposed action in 1988 is based on 40 CFR 1501.2(c) that states: "(s)tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources * * *." The 1975-76 EAs had considered appropriate alternatives, including no leasing; therefore, consideration of this alternative or other alternatives was deemed unnecessary.

3. Is existing analysis adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

☒ Yes
☐ No

Documentation of answer and explanation:

A review of the proposed action has been completed and is documented in the Interdisciplinary Team Analysis Record (Attachment DNA-1). New information or changes in circumstances are described below. This new information or changes in circumstances do significantly modify the

analysis that has been completed in the NEPA record, where significantly is considered in the context of the rules adopted by the Council of Environmental Quality.

Cultural Resources and Native American Consultation

Based on the existing information concerning cultural resources, the proposed leases are anticipated to mostly have low densities of archaeological sites. For the parcels in Sanpete and Sevier Counties, inventories of cultural sites indicate a greater prevalence of sites in the region. However, no cultural sites are recorded on any of the subject parcels.

Under Sect. 6 of the standard lease terms (Form 3100-11), siting and design of facilities may be modified to the extent consistent with lease rights granted. Under the federal regulations at 43 CFR 3101.1-2, proposed operations may be moved up to 200 meters, consistent with lease rights. A proposed site could be moved a greater distance if justified in the environmental analysis at the time of an application for oil and gas operations. Thus, a proposed operation for oil and gas may be moved to avoid impacts to archaeological or cultural resources, consistent with lease rights.

Given the absence of recorded archaeological sites on the subject parcels and the anticipated low density of cultural sites, if present, the discretionary authority to move a proposed operation would allow for adequate protection of any inventoried cultural resource site at the time of an application for exploration and/or development of oil and gas resources. Potential impacts to cultural resources could be avoided or mitigated by appropriate measures when on-the-ground exploration and development is proposed. If actual surface disturbing activities are proposed on a lease, site specific cultural resource inventories would be conducted at that time and appropriate Section 106 consultation under the National Historic Protection Act would be completed.

In addition, possible impacts to cultural resources are not anticipated, because adequate protection can be afforded by the Cultural Resource stipulation required by IM 2005-003. That stipulation is:

This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.

Thus, in accord with the State Protocol Agreement between the BLM and the Utah State Historic Preservation Officer as stated at Part VII(A)(C)(4), the recommended determination is: No Historic Properties Affected; eligible sites present, but not affected as defined by 36 CFR 800.4.

Further information is contained in a Staff Report, Cultural Resources, May 2006 Oil & Gas Lease Parcels, which is included in Attachment DNA-1.

The Paiute Indian Tribe of Utah, the Uinta and Ouray Ute Tribe, the Hopi Tribe, and the Navajo Nation were notified by certified mail of the proposed leasing by letters that were mailed on February 7, 2006. Copies of these letters are included in Attachment DNA-1. As of March 16, 2006, none of the tribes have responded. Since more than 30 days have elapsed, BLM assumes that the tribes do not have Native American concerns. In addition, all tribes would be afforded an opportunity to comment again, if on-the-ground operations, involving surface disturbance, are proposed on a lease.

Wilderness Characteristics

Parcels UT0506-135 through UT0506-137 have been inventoried by BLM and found to have wilderness characteristics. Parcel UT0506-222 includes public land, which has been proposed for wilderness consideration by external groups through the land use planning for the Richfield Field Office and that has been found likely to have wilderness characteristics through a BLM evaluation of the submitted information. These considerations constitute new information, since the completion of the NEPA record for leasing. However, the components of wilderness characteristics have been analyzed in the 1975 Richfield and Price District EAs; therefore, this new information is insignificant with regard to the analysis of the proposed action. Further discussion is provided in a Staff Report attached to the Interdisciplinary Team Analysis Record (Attachment DNA-1).

Areas of Critical Environmental Concern

Parcel UT0506-117 is contained with a proposed Area of Critical Environmental Concern, the Parker Mountain ACEC, which was proposed during public scoping for land use planning. This proposed ACEC is not specifically addressed in the existing NEPA record; however, impacts to resources that may be relevant and important to the designation of an ACEC have been considered and analyzed in the previous EAs for leasing. The relevant important values are: sagebrush steppe and habitat for sage grouse, pygmy rabbit, and Utah prairie dog. Therefore, this new information is not considered significant, and does not require preparation of a new NEPA document.

Summary of New Information and/or Circumstance

No new information or circumstances have been identified that would render the existing environmental analysis inadequate. All identified new information and/or circumstances are considered to be substantially anticipated and included within the analysis in the existing NEPA record or are otherwise insignificant additions to the information available when the existing NEPA record was compiled that would result in no significant change to the NEPA analysis.

4. Do the methodology and analytical approach used in the existing NEPA documents(s) continue to be appropriate for the current proposed action?

☒ Yes
☐ No

Documentation of answer and explanation:

The methodology and the analysis in the 1975-76 District Oil and Gas EAs are appropriate for the current proposed action. The proposed action and the existing environment are described in the NEPA documents, and the anticipated and residual impacts are considered and evaluated with respect to the elements of the environment that may be affected, if the proposed action were authorized. Anticipated and residual impacts in the 1975 EAs are inclusive of direct, indirect, and cumulative impacts. In addition, short-term use versus long-term productivity, irreversible and irretrievable commitment of resources, possible mitigations to reduce or eliminate anticipated impacts to the elements of the environment, and enhancing measures have been evaluated. An alternative, no leasing, has also been analyzed. This methodology—describing the proposed action, alternative actions, and the affected environment; analyzing the potential impacts to elements of the environment; and evaluating proposed mitigations—is consistent with the current BLM NEPA guidance and is appropriate in evaluating the possible consequences of leasing.

The 1988 Implementation EA evaluates oil and gas leasing as directed and allowed under the Mountain Valley MFP. In addition, this EA (p. 1) incorporates the 1984 CHL EIS by reference, which addressed the guidelines for the leasing category system. In the 1988 Implementation EA (p. 4, 5, 8-10, and Appendix 1), the oil and gas leasing categories are designated for public land in the Richfield Field Office. As stated in the 1988 Implementation EA (p. 1), the decisions in the land use plan are not modified. Rather the decisions in the land use plan are implemented by supporting the compliance with the NEPA process (p. 1). Through the process of preparing the 1988 Implementation EA, the BLM is assured that public land available for leasing is offered in the appropriate leasing category and that appropriate special stipulations are attached to an authorized lease. This methodology is considered appropriate to the current proposed action.

In the 1988 Implementation EA (p. 2-3), a reasonable foreseeable development (RFD) was analyzed for oil and gas exploration and development. The RFD includes one exploratory well per year, based on historical activity.

Exploration methodology has changed somewhat, since the NEPA record was completed. In general, exploration and development involves less surface disturbance than was envisioned in the existing NEPA record. Equipment for geophysical operations involves smaller trucks for drilling shot holes and for vibrating, and heliportable drilling is utilized where vehicles cannot be reasonably driven cross-country. Co-locating wells on a single well pad also is considered as an alternative to constructing an access and well pad for each well. These methodologies are considered based upon topography, existing access, exploration targets, and the feasibility of each method. The potential impacts would generally be less than analyzed in existing NEPA

documents; therefore, the existing documents adequately analyze the parcels recommended for leasing.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?

☒ Yes
☐ No

Documentation of answer and explanation:

On a programmatic basis, the 1975-76 District Oil and Gas EAs evaluated the anticipated and residual impacts that could result from oil and gas leasing. The MFPs provide specific information regarding the resources that could be impacted by oil and gas exploration and development. The 1988 Implementation EA provides an analysis of designating public land as being subject to the four leasing categories and the special stipulations under Category 2, based on specific resource information and concerns. The analysis in the 1988 Implementation EA is therefore sufficiently describes the mitigations required for leasing. Further site-specific review that addressed environmental justice, hazardous and solid waste, Native American Religious concerns, and noxious weeds in addition to the elements originally examined in the NEPA documents listed in B. and C. above, indicate the following:

Possible mitigating or enhancing measures as well as recommended mitigations or enhancements are addressed in the EAs. The impact analysis and mitigations, as appropriate, have been incorporated into the land use plan and are implemented through the 1988 Implementation EA through the leasing category system. The impacts, which are evaluated in the District Oil and Gas Leasing EAs and 1988 Implementation EA, are essentially the same now as when the EAs were prepared.

Anticipated and residual impacts are addressed in the 1975-76 EAs at:

- Richfield District Oil and Gas EA, p. 50-79 (anticipated impacts); p.115-122 (residual impacts),
- Fillmore District Oil and Gas EA, p. 61-112 (anticipated impacts); p.165-173 (residual impacts), and
- Price District Oil and Gas EA, p. 58-87 (anticipated impacts); p. 126-129 (residual impacts).

As a consideration to leasing of public land, the impacts of geophysical exploration, drilling for oil and gas, and development were addressed in the above-listed EAs. If an operator or lessee were to propose geophysical exploration, drilling of a well, or development of production facilities, then a written proposal would be required, and the action would require approval prior to such exploration or development. As stated in the 1988 Implementation EA (p. 3), a site-specific analysis and mitigation would be completed under an NEPA document for the specific proposal at the time of a specific application. As a further note, geophysical exploration is a discretionary action that does not require a lease, and applications for geophysical exploration would be considered, subject to the land use plan and a site-specific environmental analysis,

regardless of whether a lease is authorized.

6. Are the reasonably foreseeable cumulative impacts that would result from implementation of the proposed action substantially unchanged from those identified in the existing NEPA document(s)?

☒ Yes
☐ No

Documentation of answer and explanation:

As stated in the 1988 Implementation EA (p. 3), oil and gas exploration and development has historically involved an average of one exploration well per year. Based on that trend, one well per year for exploration was projected as a reasonable foreseeable development scenario as stated in the Implementation EA (p. 3, 11), and the anticipated impacts were projected to be approximately 78 acres during the subsequent 13 years. From 1988 to 2003, oil and gas activity averaged much less than one well per year, and all wells on public land were plugged and abandoned with the surface reclaimed. The 1988 Implementation EA was written to address lands managed under the MFPs, and the reasonable foreseeable development scenario, therefore, applies to public land administered by the Richfield Field Office.

Since 2003, exploration has increased within the Richfield Field Office as a result of the oil discovery in Sevier County, the Energy Act, and an increase in the prices for oil and gas. Proposed wells have been in the Sevier and Sanpete Valleys and on the Wasatch Plateau; however, all of these wells have not been on public land. Total surface disturbance on public land from the oil and gas drilling and production in the vicinity of Sevier Valley includes approximately 21 acres. At this time, an APD for public land, south of Mayfield, is being processed by the BLM. This operation, if approved, would include approximately 9 acres of federal land.

In addition, geophysical operations have increased in association with an increased interest in exploration. From 1988 through 2003, Richfield FO approved six Notices of Intent to Conduct Geophysical Operations; whereas, from 2004-2005, six seismic operations have involved BLM approval. Exploration using geophysical surveys is anticipated to continue and possibly increase in the foreseeable future. Geophysical operations were not included in the reasonable foreseeable development scenario in 1988; however, the surface disturbances associated with seismic operations have been negligible to minimal. Federal oil and gas leases are not required for seismic exploration on public land, and regardless of whether leases are issued, geophysical exploration may occur, although seismic exploration could be less likely to occur, if industry cannot obtain federal leases.

In summary, the reasonable foreseeable development included a projection of 78 acres of surface disturbance related to oil and gas exploration during a 13-year period. Although more than 13 years have elapsed since the adoption of that scenario, the total acreage has not been exceeded: For public land, approximately 21 acres of the projected 78 acres, are currently disturbed by oil

and gas operations. The 1975-76 Oil and Gas Leasing EAs and the 1988 Implementation EA considered and addressed possible residual impacts, the short-term versus long-term productivity, and the irreversible and irretrievable commitment of resources. The impact analysis in those documents has not substantially changed; however, the exploration and limited development has occurred with the activity mostly in the last two years. The 1975-76 District Oil and Gas EAs programmatically address all phases of oil and gas exploration and development, which range from preliminary investigations to abandonment, and the analysis in those documents is substantially unchanged from 1975 to the present.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

☒ Yes
☐ No

Documentation of answer and explanation:

The public was allowed an opportunity to comment on the NEPA documents that were prepared in 1975-76 and 1988, and the public was allowed to participate in the land use planning that resulted in the MFPs. In 1975, the public was notified of the environmental review for oil and gas leasing through public meetings, news releases, and radio broadcasts (1975-76 District Oil and Gas EAs). The public was allowed to review and comment on the 1988 Implementation EA (p. 13).

For the current lease sale in May 2006, the public again has been offered the opportunity to provide comments or to be involved in the process. The proposed sale and the NEPA review have been posted for public review on the Electronic Notification Bulletin Board.. A decision to lease by the BLM will be signed, once the final list of available tracts is completed and the decision is subject to protest.

The BLM notified Native American tribes of the proposed lease offer on February 7, 2006. The letters are in Attachment DNA-1, No responses have been received from Native Americans.

E. Interdisciplinary Analysis: Identify those team members conducting analysis or participating in the preparation of this worksheet.

The team members are identified in Attachment DNA-1.

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

As stated in a previous section (Criterion 3 for NEPA adequacy), parcels in this sale will have a lease notice for the protection of cultural resources in accordance with Bureau policy. In addition inventories would be used to identify specific cultural resources at the time of an application for oil and gas operations.

In addition, leasing categories and special stipulations have been identified in the applicable land use plans and the 1988 Implementation EA. The subject parcels in the Richfield Field Office, as delineated by legal description in the preliminary list (Attachment DNA-1), are designated as Category 1, which is open to leasing subject to standard lease terms. No special stipulations as required by the land use plans are applied to the subject parcels within this Field Office.

However, Parcels UT0506-135 through UT0506-137 overlap the Richfield and Price Field Offices, and the identified special stipulations on the preliminary list apply only to the portion of land within the Price Field Office as described, not the portion of the parcels within the Richfield Field Office. This designation of the special stipulations is indicated by the legal description for the specific stipulation.

CONCLUSIONS

Based on the review documented above, I conclude that:

Plan Conformance:

- ☒ This proposal conforms to the applicable land use plan.
- ☐ This proposal does not conform to the applicable land use plan

Determination of NEPA Adequacy

- ☒ The existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.
- ☐ The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

Rodney P. Lee
Rod Lee, NEPA Coordinator

3-22-06
Date

Wayne A. Wetzel
Wayne A. Wetzel, Associate Field Manager

22 Mar 2006
Date

Note: The signed conclusion at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.

Attachment DNA-1: Interdisciplinary Team Analysis Record Checklist including additional resource reports and clearances, Preliminary May 2006 List for Richfield Field Office, and maps (multiple pages).

Two Checklists are included in this document: One for the east side of the field office and one for the west side. Depending on your resource responsibilities, please complete one or both lists. The preliminary list of parcels for RFO and five maps are included after the checklists—Maps 1 & 2 for the west side of the FO; Maps 3-5, east side.

PROPOSED ACTION

Parcels of public land would be offered for the leasing of oil and gas in the May 2006 sale by competitive bidding. If a parcel is not selected competitively, then the parcel would be available through noncompetitive leasing for two years.

The subject parcels are identified on the Preliminary May 2006 Lease Sale List (Richfield FO Parcels), which is attached. The legal descriptions of the parcels and any special stipulations for a parcel are identified in the list. The subject parcels in the Richfield FO are in Sanpete, Sevier, and Wayne Counties. Some parcels involve split estate with non-federal surface estate and federal oil and gas estate.

The parcels need to be reviewed for conformance with the existing land use plans and for adequacy of the existing NEPA record. In the land use plans, public land is designated as being in Oil and Gas Leasing Category 1, 2, 3, or 4. Category 1 leases are subject to standard lease terms; Category 2, special stipulations; Category 3, no surface occupancy; and Category 4, no leasing. All the proposed parcels, as administered by RFO, appear to be in Category 1.

A DNA will be prepared to document the review, and you are asked to review the existing land use plans and environmental documents. **Per the NEPA Guidebook and directions on the Checklist, consider NC, when appropriate.** The existing NEPA record includes:

- Oil and Gas Leasing Environmental Assessment Record, 43-050-5-31, Bureau of Land Management, Richfield District (1975),
- Environmental Analysis Record, Oil and Gas Leasing, Fillmore District, Bureau of Land Management (1975, completion date),
- Price District, Oil and Gas Environmental Analysis Record, UT-060-6-1 (1975),
- Utah Combined Hydrocarbon Leasing Regional EIS (1984), and
- Oil and Gas Leasing Implementation EA for Henry Mountain and Sevier River Resource Areas (1988), UT 050-89-024.

If a parcel is offered and leased, the lease conveys a right to explore and develop mineral resources, subject to the lease terms and the applicable laws and regulations. On-the-ground operations, such as geophysical exploration or drilling, would require a separate application under a Notice of Intent or Application for Permit to Drill, and the proposed operation would be evaluated under a subsequent environmental review.

Please Note:

(1) Parcels are numbered by month, year and parcel number, such as UT0506-021. Please use that number if you have a comment for a specific parcel.

(2) If you have overlapping resource information, maps with labels, etc. that will be public documents are needed, not just a narrative description of the resource conflict or a draft map.

(3) The parcels on the west side of the FO have two parcel numbers, such as UT0506-021 and UT1204-014, 015. These parcels were previously offered in the December 2004 sale and deferred by the USO due to a protest, which has been resolved. Your comments should be the same on this parcel for this sale, May 2006, as in December 2004, unless you have new, significant information.

(4) Several of the parcels include public land in Wayne and Emery Counties. Your review would only address the portion in RFO.

(5) Parcels in Sanpete County are subject to the 1975 Fillmore District EA; Sevier, 1975 Richfield District EA; most of Wayne County, 1975 Richfield District EA; Wayne County, east of the Dirty Devil River, 1975 Price District EA. All parcels in RFO are subject to the 1988 Supplemental EA.

INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST 1 **WEST SIDE OF RICHFIELD FIELD OFFICE** **PARCELS UT0506-021, 022, 024, 025 (MAPS 1 & 2)**

Project Title: Oil and Gas Lease Sale, May 2006

NEPA Log Number: UT-050-06-018 DNA

File/Serial Number: Not Applicable

Project Leader: Michael Jackson

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section C of the DNA form.

Det ermi- nation	Resource	Rationale for Determination	Signature	Date
CRITICAL ELEMENTS				
NC	Air Quality	Existing NEPA documentation is adequate. See attachment for Air and Water Quality.	Phil Zieg	3/20/06
NP	Areas of Critical Environmental Concern	There are no lands designated as ACEC present. There are no lands proposed for possible designation as an ACEC in the new Richfield RMP as a result of public scoping.	Tim Finger	03/13/06
NI	Cultural Resources	Cultural resources are or could be present in all lease areas but, given the low site densities indicated by current information, there is room on each lease parcel to locate at least one well pad, ancillary facilities and reasonable access and still avoid any cultural resources that may be present. Additionally, a general stipulation requiring protection of cultural resources applies to all parcels. (See Staff Report: Cultural Resources, February 2006 Oil & Gas Lease Parcels: February 6, 2006).	Craig Harmon	3/16/06
NI	Environmental Justice	Impacts to local communities and economies are addressed in the existing NEPA record. Impacts include the ability to deal with migration of people, changes in the local workforce, changes in standards of housing (particularly low income), and considerations of welfare of the local population. Leasing would not adversely or disproportionately affect minority, low income or disadvantaged groups.	Michael Jackson	3/16/06
NI	Farmlands (Prime or Unique)	Prime and unique farmland was not specifically addressed in existing O&G EAs. Any actions that would cause a parcel of prime or unique farmland to fall outside the criteria for identifying prime or unique farmland, (as specified in 7CFR 657.5) and for which mitigation efforts would not return the parcel to meeting the criteria, would need to be further addressed at the time of an application for exploration and development if deemed having potential impacts on prime and unique farmland. No impacts at	Brant Hallows	3/22/06

Det ermi- nation	Resource	Rationale for Determination	Signature	Date
		this point.		
NC	Floodplains	Although existing O&G EAs do not specifically address floodplains, floodplains are indirectly but adequately addressed in discussions of drainages, streams, rivers, lakes, ponds, waterholes, seeps, and marshes. Leasing of the recommended parcels will not be contrary to Executive Order 11988-Floodplain Management	Brant Hallows	3/22/06
NI	Invasive, Non-native Species	Invasive, non-native weed species are not addressed in any of existing Oil and Gas EAs; however, the BLM does coordinate with County and local governments to conduct an active program for control of invasive species. Standard operating procedures such as washing of vehicles and annual monitoring and spraying along with site specific mitigation applied as conditions of approval (COA) at the APD stage should be sufficient to prevent the spread or introduction of Invasive, Non-native species.	Burke Williams	3-20-06
NI	Native American Religious Concerns	Letters containing notification of this lease sale and the results of our cultural resources records search were sent to the following Tribes on February 7, 2006: 1) the Paiute Indian Tribe of Utah, 2) the Uinta and Ouray Ute Tribe, 3) the Hopi Tribe, and 4) the Navajo Nation detailing the lease proposal and requesting their comments if they had any concerns with it. To date, no response has been received; therefore, BLM concludes that there are no potential impacts on traditional cultural properties. Additional consultation will be conducted should site-specific use authorization requests be received. As the proposal becomes more site-specific, tribes will again be notified and given further opportunity for comment.	Craig Harmon	3/16/06
NP	Threatened, Endangered or Candidate Plant Species	Refer to clearance.	Larry Greenwood	3-22-06
NP	Threatened, Endangered or Candidate Animal Species	Refer to clearance.	Larry Greenwood	3-22-06
NI	Wastes (hazardous or solid)	There have been no known hazardous or solid waste found within the proposed leases that have not been remediated. Drilling fluids, produced waters, and other wastes associated with the exploration, development or production of crude or natural gas are excluded as a hazardous waste under 40 CFR 261.4(b)(4). As recognized in previous analyses, site specific mitigation applied as conditions of approval (COA) at the APD stage would be sufficient to ensure proper containment, transport and disposal of solid or toxic waste if any are required or generated.	Stan Adams	3-22-06
NC	Water Quality (drinking/groun nd)	Existing NEPA documentation is adequate. See attachment for Air and Water Quality.	Phil Zieg	3/20/06
NC	Wetlands / Riparian Zones	Resource impacts have not changed from those analyzed in the original NEPA documents.	Larry Greenwood	3-22-06
NP	Wild and Scenic Rivers	None of the parcels recommended for leasing includes rivers designated as Wild and Scenic. Additionally, none of the parcels include river segments which have been found to be either eligible or suitable for possible designation as a Wild and Scenic River.	Tim Finger	03/13/06

Det ermi- nation	Resource	Rationale for Determination	Signature	Date
NP	Wilderness	None of the parcels include lands designated as Wilderness Area (WA) present.	Tim Finger	03/13/06
OTHER RESOURCES / CONCERNS				
NC	Rangeland Health Standards and Guidelines	Current EAs are adequate, no change in analysis is necessary. Water quality, vegetation, threatened & endangered species habitat and other components of ecological conditions that are considered in Rangeland Health Standards and Guides have been analyzed in the previous NEPA documents pertaining to the nominated parcels. Given the low degree of anticipated exploration and development (78 acres or less) and application of standard operating procedures (SOPs), and site specific mitigation applied at the APD stage as conditions of approval (COA), it is concluded that Rangeland Health Standards would be met.	Chris Colton	3/17/06
NC	Livestock Grazing	Given the low degree of anticipated exploration and development (78 acres or less)-and application of standard operating procedures (SOPs), and site specific mitigation applied at the APD stage as conditions of approval (COA), it is concluded that existing analysis is adequate and that livestock grazing operation would not be affected. Drill sites would be fenced. Any facilities such as fences and cattleguards that would be affected would be replaced or restored and disturbed areas would be reclaimed.	Chris Colton	3/17/06
NC	Woodland / Forestry	Given the low degree of anticipated exploration and development (78 acres or less) and application of standard operating procedures (SOPs), and site specific mitigation applied at the APD stage as conditions of approval (COA), it is concluded that woodland or forest resources would not be affected in a way not already analyzed in existing NEPA documents.	Chris Colton	3/17/06
NC	Vegetation	Given the low degree of anticipated exploration and development (78 acres or less) and application of standard operating procedures (SOPs), and site specific mitigation applied at the APD stage as conditions of approval (COA), it is concluded that vegetation resources would not be affected in a way not already analyzed in existing NEPA documents. Reseeding of perennial species to be stipulated in the APD approval should occur to protect denuded sites.	Chris Colton	3/17/06
NC	Fish and Wildlife	Some parcels contain crucial wildlife & fisheries habitat, and habitat for BLM sensitive animal species. However, in conformance with the CBGA RMP, parcels or portions of parcels within crucial wildlife habitat would be leased with a special stipulation that prevents drilling operations during the crucial period. Site specific mitigation applied at the APD stage as conditions of approval (COA), including reclamation to re-establish habitat, would mitigate impacts to wildlife. The current sensitive species list was not addressed in the existing NEPA documents. However, a special status species stipulation would be added to all of the recommended parcels to mitigate impacts to sensitive	Larry Greenwood	3-22-06
NC	Soils	Soils are adequately addressed in the water, soils, and vegetation sections of the existing O&G EAs. Given the low degree of anticipated exploration and development and application of site specific mitigation applied at the APD stage including reclamation, as conditions of approval (COA), it is concluded that existing analysis is adequate and potential impacts on soils have been adequately addressed.	Brant Hallows	3/22/06

Determination	Resource	Rationale for Determination	Signature	Date
NP	Sensitive Plant & Animal Species	Refer to clearance.	Larry Greenwood	3-22-06
	Recreation	For surface estate managed by the BLM, although the current recreation use levels and activities are very different from the existing NEPA documentation, the current recreation uses, patterns and types would not be affected by this proposal. Other than a minor amount of dispersed recreation, there are no existing recreation resources which would be affected as a result of this proposal.	Tim Finger	03/22/06
NI	Visual Resources	For surface lands managed by the BLM, the lands are managed as Visual Resource Management (VRM) Class III and IV. Management objectives for VRM Class III lands are to partially retain the existing landscape character. Management objectives for Class IV are to provide for activities which require major modification of the existing landscape. The proposal would not result in changes which exceed either of the VRM Classes.	Tim Finger	03/13/06
NC	Geology / Mineral Resources / Energy Production	<p>The existing EAs adequately addresses the impacts of oil and gas leasing, as the EAs address oil and gas operations and the impacts that could result from exploration through development. The impact analysis is found as follows:</p> <ul style="list-style-type: none"> Richfield District Oil and Gas EA, p. 50-79 (anticipated impacts); p.115-128 (residual impacts) and Fillmore District Oil and Gas EA, p. 61-112 (anticipated impacts); p. 165-173 (residual impacts). <p>Possible mitigating or enhancing measures as well as recommended mitigations or enhancements are addressed in the Richfield District EA (p. 80-115) and the Fillmore District EA (p. 112-165). The impact analysis and mitigations, as appropriate, have been incorporated into the land use plans and are implemented through the 1988 Implementation EA. The impacts, which are evaluated in the District Oil and Gas Leasing EAs and 1988 Implementation EA, are essentially the same now as when the EAs were prepared. An RFD was developed in 1988, and the projected acreage in the 1988 Implementation EA has not been exceeded on public land.</p> <p>The EAs considered impacts to the natural terrain, which results from the geology, such as landscape, scenery, and important geologic features. Possible mitigations, such as avoidance, no occupancy, and relocation of facilities, were analyzed in the EAs.</p> <p>Oil and gas exploration could lead to an increased understanding of stratigraphy and structure, which would be a benefit to minerals as well as for other uses.</p> <p>Conflicts could arise between oil and gas operations and other mineral operations, but those could be mitigated. These can be resolved generally under the regulations (3101.1-2) that proposed oil and gas operations may be relocated up to 200 meters. Also under the standard lease terms (Sec. 6), siting and design of facilities may be modified to protect other resources.</p>	Michael Jackson	3/16/06
NI	Paleontology	Impacts to paleontological resources are not anticipated. If paleontological resources are discovered, fossils could be	Michael Jackson	3/16/06

Determination	Resource	Rationale for Determination	Signature	Date
		protected under the regulatory requirement that proposed oil and gas operations may be relocated up to 200 meters. Also under the standard lease terms (Sec. 6), siting and design of facilities may be modified to protect other resources.		
NC	Lands / Access	As described, the proposed action would not affect access to public land. No roads providing access to public land would be closed on a long term basis. Any proposed project would be subject to prior existing rights-of-way (ROW) and any operations would be coordinated with ROW holders and adjacent non-federal landowners. Off-lease ancillary facilities that cross public land, if any, may require a separate authorization. Existing rights-of-way in proposed operation areas would not be affected because site specific mitigation applied at the APD stage, including the ability to move operation up to 200 meters, would ensure that communication sites, water projects, and power lines etc. would be avoided, restored or replaced. The proposed parcels are not located within an identified right-of-way corridor. Potential issues include but are not limited to surface disturbance within and outside described project area.	Nancy DeMille	03-22-06
NI	Fuels / Fire Management	Fire and fuels management was not specifically addressed in existing O&G EAs. However, application of standard operating procedures (SOPs), and site specific mitigation and safety measures applied at the APD stage would minimize the risk of inadvertent ignition. Therefore, impacts to fire or fuels management are not expected.	Russ Ivie	03/16/06
NC	Socio-economics	Socio-economic conditions are adequately addressed in the existing NEPA record. Impact analysis includes changes in workforce, migration of people as economic conditions change from early exploration to a decline in production, strain on community services, demand for and changes in realty values, and other consequences that could occur as a result of leasing. To date, this analysis is still applicable as the oil and gas exploration and development in RFO has not exceeded the levels of activity anticipated in the existing NEPA record.	Michael Jackson	3/16/06
NP	Wild Horses and Burros	None of the nominated parcels are within a Herd Management Area (HMA) designated under the land use plan.	Dona Rees	3/22/06
NP	Wilderness characteristics	The nominated parcels do not contain lands which have been inventoried by BLM and found to possess wilderness characteristics; lands which have been submitted to BLM in planning scoping and which have been evaluated by BLM and found to likely possess wilderness characteristics or lands which have been submitted directly to Congress for possible wilderness designation by any individual or special interest group.	Tim Finger	03/13/06
NI	Migratory Birds	Migratory birds were not addressed in the original NEPA documents. However, leasing land would have no affect, positively or negatively, on migratory bird species.	Larry Greenwood	3-22-06

INTERDISCIPLINARY TEAM ANALYSIS RECORD CHECKLIST 2
EAST SIDE OF RICHFIELD FIELD OFFICE
PARCELS UT0506-117, 135, 136, 137, 192, 221, and 222 (MAPS 3-5)

Project Title: Oil and Gas Lease Sale, May 2006

NEPA Log Number: UT-050-06-018 DNA

File/Serial Number: Not Applicable

Project Leader: Michael Jackson

DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present with potential for significant impact analyzed in detail in the EA; or identified in a DNA as requiring further analysis

NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section C of the DNA form.

Determina-tion	Resource	Rationale for Determination	Signature	Date
CRITICAL ELEMENTS				
NC	Air Quality	Existing NEPA documentation is adequate. See attachment for Air and Water Quality.	Phil Zieg	3/20/06
NI	Areas of Critical Environmental Concern	There are no lands designated as ACEC present. There are lands which have been proposed for possible ACEC designation in the new RMP as a result of public scoping. Since this is new information, the existing LUP does not address the potential ACEC, but does have information on the resource values and is still the controlling management document. Parcel UT0506-117 lies completely within the nominated "Parker Mountains ACEC". The Relevant and Important values are addressed in other sections, below. The proposal would not affect the final decision on designation in the RMP.	Tim Finger	03/13/06
NI	Cultural Resources	Cultural resources are or could be present in all lease areas but, given the low site densities indicated by current information, there is room on each lease parcel to locate at least one well pad, ancillary facilities and reasonable access and still avoid any cultural resources that may be present. Additionally, a general stipulation requiring protection of cultural resources applies to all parcels. (See Staff Report: Cultural Resources, February 2006 Oil & Gas Lease Parcels: February 6, 2006).	Craig Harmon	3/16/06
NC	Environmental Justice	Impacts to local communities and economies are addressed in the existing NEPA record. Impacts include the ability to deal with migration of people, changes in the local workforce, changes in standards of housing (particularly low income), and considerations of welfare of the local population. Leasing would not adversely or disproportionately affect minority, low income or disadvantaged groups.	Michael Jackson	3/22/06
NI	Farmlands (Prime or	Prime and unique farmland was not specifically addressed in existing O&G EAs. Any actions that would cause a parcel of	Brant Hallows	3/22/06

Determination	Resource	Rationale for Determination	Signature	Date
	Unique)	prime or unique farmland to fall outside the criteria for identifying prime or unique farmland, (as specified in 7CFR657.5) and for which mitigation efforts would not return the parcel to meeting the criteria, would need to be further addressed at the time of an application for exploration and development if deemed having potential impacts on prime and unique farmland. No impacts at this point.		
NC	Floodplains	Although existing O&G EAs do not specifically address floodplains, floodplains are indirectly but adequately addressed in discussions of drainages, streams, rivers, lakes, ponds, waterholes, seeps, and marshes. Proposed action will not be contrary to Executive Order 11988-Floodplain Management.	Brant Hallows	3/22/06
NI	Invasive, Non-native Species	Invasive, non-native weed species are not addressed in any of existing Oil and Gas EAs; however, the BLM does coordinate with County and local governments to conduct an active program for control of invasive species. Standard operating procedures such as washing of vehicles and annual monitoring and spraying along with site specific mitigation applied as conditions of approval (COA) at the APD stage should be sufficient to prevent the spread or introduction of Invasive, Non-native species.	Burke Williams	3-20-06
NI	Native American Religious Concerns	Letters containing notification of this lease sale and the results of our cultural resources records search were sent to the following Tribes on February 7, 2006: 1) the Paiute Indian Tribe of Utah, 2) the Uinta and Ouray Ute Tribe, 3) the Hopi Tribe, and 4) the Navajo Nation detailing the lease proposal and requesting their comments if they had any concerns with it. To date, no response has been received; therefore, BLM concludes that there are no potential impacts on traditional cultural properties. Additional consultation will be conducted should site-specific use authorization requests be received. As the proposal becomes more site-specific, tribes will again be notified and given further opportunity for comment.	Craig Harmon	3/16/06
NP	Threatened, Endangered or Candidate Plant Species	TECS were not specifically mentioned in the Richfield or Price 1975 EAs. There are no known TECS species present in the area of parcel 135, 136, 137, 221, 222, or 192 (Literature search and field surveys)	Leroy L Smalley	3/21/06
NI	Threatened, Endangered or Candidate Animal Species	As stated in the 1975 Oil and Gas EA # 43-050-5-31, P. 112 "Unique wildlife habitat areas or potential habitat areas for rare and endangered or threatened speciesshall be avoided." In all the parcels east of Capitol Reef NP, there are no designated by USFWS or UDWR critical or crucial habitats for any TESC species. There are no known TESC species present in these areas as well. (literature search and field surveys)	Suzanne Grayson	3/16/06
NC	Wastes (hazardous or solid)	There have been no known hazardous or solid waste found within the proposed leases that have not been remediated.	Stan Adams	3/22/06
NC	Water Quality (drinking/ground)	Existing NEPA documentation is adequate. See attachment for Air and Water Quality.	Phil Zieg	3/20/06
NP	Wetlands / Riparian Zones	There are no riparian resources present within any parcels east of CRNP.	Suzanne Grayson	3/16/06
NP	Wild and Scenic Rivers	There are no rivers designated as Wild and Scenic. There are no river segments which have been found to be either eligible or suitable for possible designation as a Wild and Scenic River.	Tim Finger	01/25/06
NP	Wilderness	There are no lands designated as Wilderness Area (WA) present.	Tim Finger	03/13/06

Determination	Resource	Rationale for Determination	Signature	Date
OTHER RESOURCES / CONCERNS				
NI	Rangeland Health Standards and Guidelines	Rangeland Health Standards and Guidelines were not addressed in the Richfield or Price Oil and Gas EA. However, the four components of Rangeland Health were discussed in the two EAs. Impacts to upland soils, Richfield EA page 52, aquatic vegetation (riparian), Richfield EA page 62, native species (vegetation), Richfield EA page 62, and clean water, Richfield EIS page 61. In the Price EA impacts to upland soils page 61, aquatic vegetation (riparian) page 65-67, native species (vegetation) 65-67, and clean water (surface water) page 64-65.	Leroy L Smalley	3/21/06
NI	Livestock Grazing	Although livestock was not directly addressed in the Richfield or Price Oil and Gas EIS 1975 impacts to animals was. Impacts to livestock would be the same as impacts to other animals using the range. Impacts to animals in the Richfield EIS are on Pages 64-66 and Price EIS 67-69.	Leroy L Smalley	3/21/06
NC	Woodland / Forestry	The proposed lease parcels support a salt desert shrub or grassland community and therefore, there are little woodland and no forest resources present. The 1975 Price Oil and Gas EA would apply to Parcels 192, 221 and 222. Pages 65 – 67 of this EA addressed impacts to vegetation, which would include woodland/forestry, from the exploration to the development stages. O&G Leasing EA 43-050-5-31 analyzed the lands included in Parcels 135, 136 and 137. This EA also included an adequate analysis of vegetation on Pages 62-64. Woodland or forest resources would not be affected in a way not already analyzed in the existing NEPA documents.	Sue Fivecoat	03/20/06
NC	Vegetation	Impacts to vegetation were adequately analyzed in the Richfield and Price Oil and Gas EIS from exploration to full development of the drill pads and fluid production. Vegetation was analyzed on page 62–64 in the Richfield EIS 1975 and on pages 65- 67in the Price EIS 1975.	Leroy L Smalley	3/21/06
NI	Fish and Wildlife	There are no designated (by UDWR) crucial habitats for wildlife within Parcels 135-137. There is “substantial” antelope habitat encompassed by Parcel 221, 222, and 192. Substantial habitat is defined by UDWR as “an area that provides for frequent use by the species.” Page 93 of the 1975 Oil and Gas EA # 43-050-5-31 lists mitigation for antelope fawning areas. There would be no impacts to fish resources because there are no riparian resources present in any of the parcels east of Capitol Reef NP.	Suzanne Grayson	3/16/06
NI	Sensitive Plant &	Sensitive Plant species were not addressed in the Richfield or Price EAs. There are no known sensitive plants species present in parcels 137,136,135, 221, 222, or 192 in the Henry Mountain field area (literature search and field surveys).	Leroy L Smalley (flora)	3/21/06
NC	Animal Species	As stated in the 1975 Oil and Gas EA # 43-050-5-31, P. 112 “Unique wildlife habitat areas or potential habitat areas for rare and endangered or threatened speciesshall be avoided.” In all the parcels east of Capitol Reef NP, there are no designated by USFWS or UDWR critical or crucial habitats for any TESC species. There are no known TESC species present in these areas as well. (literature search and field surveys). Please see pp. 91 92, 93, and PP. 112 and 113	Suzanne Grayson (fauna)	3/16/06
NC	Soils	Soils are adequately addressed in the water, soils, and vegetation sections of the existing O&G EAs.	Brant Hallows	3/22/06

Determination	Resource	Rationale for Determination	Signature	Date
NI	Recreation	The Price O&G EA UT-060-6-1 applies to lease parcels 192, 221 and 222. The Socio-Cultural Interests section on Pages 77-82 primarily addressed developed and other sites of specific interest. It did identify that the same impacts would apply to undeveloped areas as developed areas since they are now being used for camping. On Pages 55-56 of the Richfield O&G EA, there is a general discussion of recreation impacts. This discussion would apply to parcels 135, 136 and 137. Other than a minor amount of dispersed recreation, there are no existing recreation resources which would be affected as a result of this proposal. Although recreation uses in the area as a whole have increased, there has been little change in general recreation activities for the lease parcels. The existing NEPA analysis would still be adequate.	Sue Fivecoat	03/21/06
NC	Visual Resources	The existing NEPA documents adequately addressed visual resources. Pages 75-77 of the Price O&G EA UT-060-6-1, includes a discussion of the landscape character and changes that could occur from O&G activities. A similar discussion was included on Pages 70-72 of the Richfield O&G EA 43-050-5-31. The Wayne County portions of parcels UT0506-135, 136, 137, 221 and 222, and all of parcel UT0506-192 are within VRM Class IV areas. Management objectives for Class IV are to provide for activities which require major modification of the existing landscape. The proposal would be consistent with these objectives.	Sue Fivecoat	03/20/06
NC	Geology / Mineral Resources / Energy Production	<p>The existing EAs adequately address the impacts of oil and gas leasing, as the EAs address oil and gas operations and the impacts that could result from exploration through development. The analysis is found as follows:</p> <p>Price District Oil and Gas EA, p. 58-78 (analysis of environmental impacts); p.88-135 (possible mitigating or enhancing measures).</p> <p>Supplement to Price District O & G Environmental Record, p. 1-14, Appendices A (BLM Utah Instruction Memorandum 81-169-Lease Stipulations) and B (Typical Supplemental Stipulations Developed from Onsite Inspections).</p> <p>The EAs considered impacts to the natural terrain such as landscape, scenery and geologic features. Possible mitigations such as avoidance, no surface occupancy and relocation of facilities were analyzed in the EAs. Areas of exceptionally high geologic value or unique quality may be excluded from oil and gas exploration and development (Price District O&G EA, p. 96).</p> <p>Oil and gas exploration could lead to an increased understanding of stratigraphy and structure, which would be a benefit to minerals as well as for other uses.</p> <p>Conflicts could arise between oil and gas operations and other mineral operations. These could generally be mitigated under the regulations 3101.1-2 where proposed oil and gas operations may be relocated up to 200 meters and also under the standard lease terms (Sec. 6), siting and design of facilities may be modified to protect other resources.</p>	Francis Rakow	03/22/2006
NP	Paleontology	No vertebrate fossil-bearing rocks crop out within the lease parcels. If paleontological resources were encountered, they would be protected by regulation where proposed oil and gas operations may be relocated up to 200 meters. Also under the standard lease	Francis Rakow	03/22/2006

Determination	Resource	Rationale for Determination	Signature	Date
		terms siting and design of facilities may be modified to protect other resources.		
NC	Lands / Access	As described, the proposed action would not affect access to public land. No roads providing access to public land would be closed on a long term basis. Proposed project would be subject to prior existing rights-of-way (ROW) and any operations would be coordinated with ROW holders and adjacent non-federal landowners. Off-lease ancillary facilities that cross public land, if any, may require a separate authorization. Potential issues include but are not limited to surface disturbance within and outside described project area.	Nancy DeMille	03-22-06
NI	Fuels / Fire Management	Fire and fuels management was not specifically addressed in existing O&G EAs. However, application of standard operating procedures (SOPs), and site specific mitigation and safety measures applied at the APD stage would minimize the risk of inadvertent ignition. Therefore, impacts to fire or fuels management are not expected.	Russ Ivie	03/16/06
NC	Socio-economics	Socio-economic conditions are adequately addressed in the existing NEPA record. Impact analysis includes changes in workforce, migration of people as economic conditions change from early exploration to a decline in production, strain on community services, demand for and changes in realty values, and other consequences that could occur as a result of leasing. To date, this analysis is still applicable as the oil and gas exploration and development in RFO has not exceeded the levels of activity anticipated in the existing NEPA record.	Michael Jackson	3/22/06
NI	Wild Horses and Burros	There are no HMAs in this area.	Dona Rees	3/22/06
NI/NC	Wilderness characteristics	There are lands which have been inventoried by BLM and found to possess wilderness characteristics. Lease parcels UT 05006-135, 136, and 137 all lie within an area inventoried as "Muddy Creek-Crack Canyon". See attached Staff Report. There are lands which have been submitted to BLM in planning, evaluated and found likely to possess wilderness characteristics. A portion of Lease parcel UT-0506- 222 lie within the area evaluated as "Flat Tops". This is new information, discussed in the attached Staff Report. There are also lands which have been submitted directly to Congress for possible designation as Wilderness by a Special Interest Group. This bill is known as the "America's Redrock Wilderness Act" (Senate Bill 882). Since the proposal information was submitted to Congress and not BLM, the RFO cannot analyze possible impacts to the Red Rock Desert proposal.	Tim Finger	03/15/06
NC	Migratory Birds	Migratory birds are not specifically mentioned in the 1975 Oil and Gas Leasing EA. However, specific wildlife protection measures are listed on p. 112 and would be applicable.	Suzanne Grayson	3/16/06

FINAL REVIEW:

Reviewer Title	Signature	Date	Comments
NEPA / Environmental Coordinator	<i>Rodney P. Lee</i>	<i>3-22-06</i>	
Authorized Officer	<i>Wayne A. Uetzel</i>	<i>22 Mar 06</i>	